

## UNITED STATES DISTRICT COURT

for the

2018 MAR 21 PM 1:42

Northern District of Texas

DEPUTY CLERK

DXS

United States of America  
v.

Case No.

KYUNG MIN KONG (01)  
BON JUN KOO (02)  
MOO KYUM LEE (03)

2:18-MJ-32

*Defendant(s)*

## CRIMINAL COMPLAINT

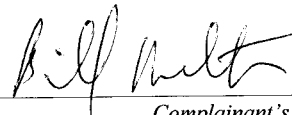
I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 20, 2018 in the county of Carson in the  
Northern District of Texas, the defendant(s) violated:*Code Section**Offense Description*Title 18, United States Code,  
Section 1029(a)(1).

Production, Use, and Trafficking in Counterfeit Access Devices

This criminal complaint is based on these facts:

see attached affidavit in support of complaint.

☒ Continued on the attached sheet.*Complainant's signature*

Billy Melton, HSI Special Agent

*Printed name and title*

Sworn to before me and signed in my presence.

Date: 03/21/2018*Judge's signature*City and state: Amarillo, Texas

Douglas R. Woodburn, District Court Judge

*Printed name and title*

2:18-MJ-32

AFFIDAVIT IN SUPPORT OF COMPLAINT

I am a Special Agent of the United States Department of Homeland Security, Immigration and Customs Enforcement, Homeland Security Investigations (ICE-HSI) and have been so employed since February, 2009. As a Special Agent of ICE-HSI, I have attended both the Criminal Investigator Training Program and Immigration and Customs Enforcement Special Agent Training school at the Federal Law Enforcement Training Center. I am a Certified Anti-Money Laundering Specialist (CAMS) and my primary duty with HSI Amarillo is the investigation of financial crimes.

On March 20, 2018, at approximately 6:01 p.m., Texas Department of Public Safety (DPS) Trooper K. Kieth conducted a traffic stop of a Gray 2017 Kia with California plate 7YTZ048, on Interstate 40, at mile marker 95, in Carson County, Texas, due to driving in the left lane without attempting to pass, a violation to the Texas Transportation Code. Trooper Kieth identified the driver of the Kia as Kyung Min KONG (KONG) and the passengers as Moo Kyum LEE (LEE) and Bon Jun KOO (KOO). A registration check on the vehicle showed it registered as leased to KIM BONG, 950 Magnolia Avenue, 18, Los Angeles, California 90006.

Trooper Kieth noticed that KONG was extremely nervous and was evasive in his answers when asked about the particulars of his travel. After running records checks, Trooper Kieth issued a written warning to KONG for driving in left lane when not passing or where prohibited, returned KONG's driver's license to him, and then asked if he was transporting any illegal narcotics, large amounts of currency and/or weapons. Trooper Kieth then specifically asked KONG about an arrest for credit card charges. Following this question, Trooper Kieth asked for permission to search KONG's vehicle. KONG gave verbal consent to search the vehicle. The passengers, LEE and KOO, also gave consent to search the vehicle and their belongings.

During a search of the vehicle, Trooper Kieth discovered a bag in the back of the van, containing multiple gift cards, debit cards, driver's licenses, blank checks with signatures, passports, and immigration paperwork; which Trooper Kieth believed to be counterfeit.

Trooper Kieth arrested KONG, LEE, and KOO and transported them and the evidence back to the DPS offices in Panhandle, Texas.

United States Immigration and Customs Enforcement (ICE) Homeland Security Investigations (HSI) Special Agents (SAs) Billy Melton, Theodore Dekreek, and Jacob Simmons arrived at the DPS facility in Panhandle, Texas, and began an investigation. SA Melton read LEE his Miranda Statement of Rights in the English language. LEE acknowledged in writing that he understood his rights and he agreed to make a statement without the presence of an attorney.

LEE told agents that the men were coming from Biloxi, Mississippi, to Los Angeles, California. LEE stated that he had debt from a business that closed down and was unemployed. LEE told agents that he had some friends that asked if he wanted to work, yet did not explain the work. LEE said one of the friends; Hwa OH (OH) introduced him to KONG and KOO.

LEE said that he was supposed to be paid \$1,000.00 USD to drive and needed to provide a passport photo to KONG. LEE said that he saw a fake passport with his photo when he arrived in Biloxi. LEE told agents that he used one of the counterfeit documents to attempt to deposit a check for \$1,800.00 USD from Wells Fargo Bank into an account at a Wells Fargo. LEE told agents that the bank would not accept the check.

SA Melton read KOO his Miranda Statement of Rights in the English language. KOO acknowledged in writing that he understood his rights and he agreed to make a statement without the presence of an attorney.

KOO told agents that the men had flown to Biloxi, Mississippi, and KOO was to be provided with a free trip in exchange for driving. KOO told agents that he gave a passport photograph of himself to KONG. KOO said he first saw the documents in Biloxi. KOO admitted to attempting to conduct financial transactions with the counterfeit documents. KOO said that he was only successful in depositing \$100.00 USD in one of the banks.

During this time, KONG was advised of his Miranda rights. KONG acknowledged that he understood these rights and agreed to waive his rights and answer questions. KONG told law enforcement officers that he knew some people from the Commerce Casino in Los Angeles that help people obtain counterfeit documents in order to apply for credit using the fraudulent documents. KONG told agents that many people that have gambling problems and debt will engage in this type of activity.

KONG admitted to agents that he had received photographs from both LEE and KOO. KONG said he then gave the photographs to a man that he only knew as "Mr. Lee," who would then have the documents produced using the passport photographs.

KONG told agents that the men had flown to Biloxi, Mississippi, and “Mr. Lee” had a van waiting for him at the airport. KONG stated that he received the key to the van in Los Angeles from “Mr. Lee.” KONG said that the packets that included counterfeit documents, stored value cards, and checks, were already placed in the vehicle when they arrived.

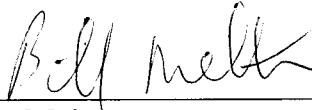
KONG told agents that on two occasions, he borrowed \$3,000.00 USD from “Mr. Lee,” which would not have to be repaid if the trip was successful. KONG said that he would not know if the trip was successful until “Mr. Lee” advised him that the accounts were approved.

KONG said that LEE visited five or six banks on this trip and KOO made attempts to open accounts at three banks. KONG said that one bank told KOO that his counterfeit passport looked strange. KONG said that KOO was only able to open one account at a bank approximately 40 to 50 minutes’ drive east of Biloxi.

KONG, KOO, and LEE, were in possession of multiple documents. The documents included four Republic of Korea passports with LEE’s photograph and with four separate identities. The four passports have counterfeit United States Visas with the corresponding aliases. The men were also in possession of two Korean passports with KOO’s photograph with identities other than his own, with corresponding United States Visas.

Seventeen driver’s licenses were found with the other documents using the photographs of three unidentified males with various identities were also found in the van with the counterfeit documents with LEE and KOO’s likenesses. Approximately 84 assorted bank cards in various identities were also found with the counterfeit documents.

Based upon the foregoing, there is probable cause to believe that KONG, LEE, and KOO knowingly and with intent to defraud, possesses fifteen or more devices, which are counterfeit or unauthorized access devices, in violation of Title 18, United States Code, Section 1029.

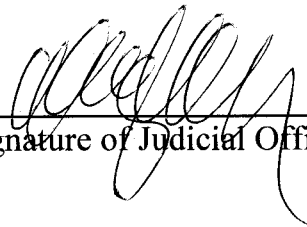



Billy Melton  
Special Agent-HSI

Sworn to before me, and subscribed in my presence

March 21, 2018 at Amarillo, Texas  
Date City and State

Douglas R. Woodburn, District Court Judge  
Name and Title of Judicial Officer

  
Signature of Judicial Officer  
Anna Marie Bell  
Assistant U.S. Attorney